

# Modern Day Slavery Statement – FY24



**Control Date : Wednesday, 3 December 2025**  
**Status : Final**

Page intentionally left blank

# Contents

- MESSAGE FROM THE CHIEF EXECUTIVE OFFICER ..... 4**
- ABOUT CONDUENT VICTORIA TICKETING SYSTEM..... 5**
- OUR SUPPLY CHAIN..... 5**
  - Primary supplier categories include:..... 5
- HOW WE IDENTIFY RISK ..... 6**
- HOW WE MITIGATE RISK..... 7**
  - Supplier Governance ..... 7
  - Supplier Code of Conduct..... 7
  - Contractual Compliance ..... 7
  - Training & Internal Capability ..... 7
- EFFECTIVENESS OF OUR ACTIONS ..... 8**
  - Supplier Due-Diligence Monitoring:..... 8
  - Contractual Compliance Oversight: ..... 8
  - Training Uptake and Capability Measures: ..... 8
  - Internal Escalation and Incident Review: ..... 8
  - Governance and Continuous Improvement:..... 8
- REMEDICATION & INCIDENT RESPONSE..... 9**
- CONSULTATION ..... 9**
- OUR POLICIES ..... 9**
- FUTURE COMMITMENTS ..... 10**
- APPROVAL..... 10**

## Message from the Chief Executive Officer

At Conduent Victoria Ticketing Systems (CVTS), our purpose is more than delivering a world-class ticketing system for Victoria it is doing so in a way that respects human dignity and upholds the rights of every person connected to our operations and supply chain. Modern slavery, in all its forms, is fundamentally incompatible with our values.

We operate in sectors and supply chains that span hardware manufacturing, software development, logistics, and labour-hire. Some of these categories carry heightened modern slavery risk globally. That is why we have embedded modern slavery considerations into our procurement processes, contractual terms, supplier governance, and staff training not as a one-off exercise, but as part of how we do business every day.

During this reporting period, we strengthened our onboarding and due-diligence processes, reinforced modern slavery clauses in our contracts, and expanded internal training so that every employee understands both the risk and their role in identifying and escalating concerns. While no instances of modern slavery were identified, we recognise that the absence of detected cases does not mean an absence of risk. Our focus is on continuous improvement improving transparency, strengthening our controls, and working collaboratively with suppliers to lift standards across the supply chain.

Looking ahead, CVTS is committed to further maturing our modern slavery framework through more robust vendor governance, deeper staff capability, and stronger monitoring and reporting. As Chief Executive Officer, I am accountable, along with the Board, for ensuring that these commitments are implemented and resourced. We will continue to work closely with our partners and stakeholders to ensure that the ticketing system we deliver for Victoria is not only technologically advanced and reliable, but also underpinned by responsible, ethical, and humane business practices.

**Alex Panayi**  
**Chief Executive Officer**  
**Conduent Victoria Ticketing System**



## About Conduent Victoria Ticketing System

This Modern Slavery Statement is made by Conduent Victoria Ticketing System Pty Ltd (CVTS) (ABN 87 667 867 950) pursuant to section 13 of the Modern Slavery Act 2018 (Cth) for the reporting period 1 July 2024 to 30 June 2025. CVTS has been formed to operate and uplift Victoria's ticketing system, including the current Card-Based Ticketing (CBT) system and the implementation of Account-Based Ticketing (ABT).

## Our Supply Chain

CVTS delivers a broad range of technology, engineering, operational and support services to maintain the ticketing system. To do this, we engage a diverse supplier network spanning local, national, and international markets. Our supply chain includes both direct suppliers that provide goods and services to CVTS, and indirect suppliers engaged through subcontracting arrangements.

Our key supply-chain sectors include:

- **Hardware manufacturing and electronics** – including smartcard components, validators, kiosks, and related assemblies sourced through global manufacturing partners.
- **Software, engineering, cybersecurity and platform services** – supporting the development, integration, and operation of the ticketing system.
- **Labour-hire, professional services and consultancy providers** – supplying skilled technical, project, and operational personnel.
- **Logistics, freight, warehousing and distribution** partners – involved in the movement, handling, and storage of hardware and equipment.
- **Civil works, fabrication, maintenance and installation contractors** – delivering site works, infrastructure cabling, repairs, and on-site support.

### Primary supplier categories include:

- Technology and engineering providers
- Hardware and electronics manufacturers
- Cybersecurity, data, and cloud service providers
- Labour-hire and advisory firms
- Civil works and installation contractors

CVTS' supply chain spans multiple tiers and geographies, reflecting the specialised nature of ticketing technology procurement. As a result, supplier risk levels differ based on location, industry, and labour model. These characteristics inform CVTS' approach to supplier due diligence, contractual controls, and ongoing monitoring.

## How we identify risk

CVTS recognises that certain aspects of our operations and supply chain carry inherent modern slavery risks due to the nature of the technology, manufacturing, labour-hire, and logistics sectors in which we operate. These risks do not indicate the presence of modern slavery within CVTS or our suppliers, but they reflect structural vulnerabilities that require active and ongoing oversight. The key areas of inherent risk relevant to CVTS include:

- Electronics and Hardware Manufacturing
- Logistics, Freight and Warehousing
- Civil Works and Fabrication Services
- Complex Multi-Tier Supply Chains

CVTS considers these inherent risks when conducting supplier due diligence, assessing engagement decisions, drafting contractual controls, and determining appropriate levels of ongoing monitoring. Our risk-based approach ensures that modern slavery exposure is identified early, proactively managed, and embedded within our broader procurement and governance frameworks.

## How we mitigate Risk

We are incorporating our approach to address the various risks of modern slavery practices in our corporate governance processes e.g. procurement and risk management. This will ensure that our organisation has robust and effective processes that are firmly embedded in how we do business. CVTS service agreements and purchase order terms and conditions have already been amended to help ensure that our service providers are meeting their modern slavery obligations

### Supplier Governance

Our supplier onboarding process incorporates structured modern slavery due diligence requirements. All prospective suppliers undergo a mandatory screening process. CVTS uses an assessment tool to evaluate each supplier's profile and to identify any red flags. This ensures modern slavery considerations are embedded into our procurement workflow and that no supplier is onboarded without an assessed risk position and appropriate mitigation controls.

### Supplier Code of Conduct

The purpose of our Supplier Code of Conduct is to ensure all Conduent Supplier business is conducted with the highest standards of integrity and in compliance with all applicable laws and regulations. The Code is intended to help Suppliers recognise ethics and compliance issues before they arise and to appropriately and thoroughly address issues that occur. It embodies the guiding principles and sets the tone for how Conduent's Suppliers are expected to do business every day.

### Contractual Compliance

All CVTS subcontract agreements contain a Modern Slavery clause requiring suppliers to uphold ethical labour standards and prevent any form of exploitation. These obligations are flowed down into all SOWs, POs, and variations. CVTS reviews compliance through onboarding checks, periodic reviews, and audit rights. Subcontractors must promptly report any suspected breaches and cooperate with any investigation. Non-compliance may result in corrective actions or contract termination.

### Training & Internal Capability

Every staff member completes Modern Day Slavery training through our e-learning platform as part of our baseline compliance program. Procurement teams also receive enhanced briefings on risk indicators. In addition, all employees receive Modern Slavery content as part of their online learning to ensure capability is consistent.

## Effectiveness of Our Actions

CVTS evaluates the effectiveness of its modern slavery risk-management activities through a combination of monitoring, review, and governance oversight. Our approach is focused on ensuring that the controls embedded across procurement, supplier management, and internal capability are operating as intended and delivering measurable improvements over time.

### Supplier Due-Diligence Monitoring:

CVTS reviews the outcomes of our supplier onboarding process annually to confirm that all new suppliers have completed mandatory modern slavery screening prior to engagement. Any identified red flags, escalation actions, or requested clarifications are documented and reviewed by Procurement and Legal to assess whether controls are working effectively.

### Contractual Compliance Oversight:

We monitor adherence to our modern slavery contractual clauses through periodic supplier checks, including verification of subcontractor disclosures, acknowledgement of modern slavery obligations, and review of relevant certifications where required. Non-compliance or gaps identified during these checks inform future contractual improvements and supplier engagement activities.

### Training Uptake and Capability Measures:

Training completion rates for the compulsory Modern Slavery e-learning module are tracked to ensure full staff coverage. Completion data and feedback help assess whether staff are retaining the knowledge required to identify and escalate potential risks.

### Internal Escalation and Incident Review:

Although no incidents were identified during the reporting period, CVTS reviews any concerns raised through our Legal, Risk, or Executive escalation channels to test the effectiveness of our incident response pathways. This includes assessing whether staff escalated appropriately and whether our remediation processes align with best-practice expectations.

### Governance and Continuous Improvement:

Insights from due-diligence reviews, training data, and supplier monitoring are reported through CVTS' internal governance channels, including the Executive and the Board. These insights inform our continuous improvement roadmap, shaping enhancements to our risk assessment tools, contract templates, and supplier engagement processes.

Through these measures, CVTS maintains visibility over the performance of our modern slavery controls and ensures our program evolves in line with emerging risks, regulatory expectations, and global best practice

## Remediation & Incident Response

No confirmed instances of Modern Slavery were identified during the reporting period. CVTS maintains clear escalation pathways to Legal, Risk, and Executive leadership to ensure any concerns are rapidly assessed and addressed. Our remediation approach is grounded in the UN Guiding Principles, with a primary focus on protecting affected workers and ensuring responsible corrective action.

## Consultation

CVTS prepared this Modern Slavery Statement in consultation with key internal stakeholders. The development process included input and review from Procurement & Human Resources, to ensure that the statement accurately reflects CVTS operational context, supply chain structure, and risk-management practices. The statement was also reviewed with the CVTS Board as part of the approval process. This collaborative approach ensures alignment across all relevant business areas and supports a consistent organisational response to modern slavery risks.

## Our Policies

Implementation of various organisational policies and procedures:

Document	Relation to Modern Slavery
Modern Slavery Policy	This policy establishes CVTS’ commitment to preventing modern slavery within our operations and supply chain. It outlines our framework for identifying and assessing risks, implementing controls, reporting concerns, and ensuring all employees understand their obligations. The policy aligns with the Modern Slavery Act 2018 (Cth) and relevant international conventions.
Code of Conduct Policy	The Code of Conduct sets clear expectations for ethical behaviour, human rights protections, and compliance with applicable State, Commonwealth, and international laws. It requires employees and contractors to act with integrity and supports early identification of behaviours or practices that may indicate exploitation or misconduct.
Procurement Policy	The CVTS Procurement Policy provides guidance on responsible purchasing, supplier engagement, and risk assessment. It requires the use of structured due diligence processes, fair and transparent sourcing practices, and mandatory checks that incorporate modern slavery considerations. This policy ensures that procurement decisions support ethical and sustainable supply chains.
HR Policy	CVTS’ HR policies govern recruitment, onboarding, employment conditions, and workforce management. These policies ensure that staff are engaged lawfully, remunerated appropriately, and protected from discrimination, coercion, or unsafe working conditions. They reflect CVTS’ commitment to fair treatment and strong governance across our internal workforce.

*Printed copies are not controlled and should be considered out of date.*

*This document has been prepared by Conduent Victoria Ticketing System (CVTS) for the recipient. The document and its information is the Intellectual Property of CVTS and is Final. No part of this document may be reproduced, copied, communicated or otherwise without prior approval or permission. This document may be governed by the terms of the Public Transport Ticketing Agreement for the State of Victoria.*

## Future Commitments

Over the next 12 months, CVTS will strengthen its approach to modern slavery risk by implementing a more robust vendor-governance framework to better identify and manage potential supply-chain exposures. We will deepen staff engagement through targeted awareness sessions and reinforce expectations by ensuring modern slavery obligations are explicitly embedded in all relevant supplier contracts.

## Approval

This statement was approved by Conduent Victoria Ticketing Systems Board of Directors in accordance with the Modern Slavery Act 2018 (Cth). This Board has authorised Alex Panayi, Chief Executive Officer, to sign the Statement.



**Signed:**

**Date:** 29<sup>th</sup> of December 2025

**Alex Panayi**

Chief Executive Officer

Conduent Victoria Ticketing Systems Pty Ltd